

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

THIS DOCUMENT RELATES TO:

No. 21-cv-01493

*Connie Joann Baker, et al. v. National Football
League, et al.*

**MOTION TO DISMISS THE COMPLAINT FILED BY
SETTLEMENT CLASS MEMBER CONNIE JOANN BAKER**

Defendants the National Football League and NFL Enterprises LLC (the "NFL Parties") move to dismiss, with prejudice, the Complaint filed by Settlement Class Member Connie Joann Baker, individually and on behalf of the Estate of Donnell Baker and Mr. Baker's children. In support of this motion, the NFL Parties rely on the points and authorities in the accompanying memorandum of law, which the NFL Parties submit herewith and incorporate herein in its entirety.

Dated: April 21, 2021

Respectfully submitted,

/s/ Brad S. Karp

Brad S. Karp

Bruce Birenboim

Claudia Hammerman

Lynn B. Bayard

PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP
1285 Avenue of the Americas
New York, NY 10019-6064
bkarp@paulweiss.com
Main: 212.373.3000
Fax: 212.757.3990

TROUTMAN PEPPER LLP
Sean P. Fahey
3000 Two Logan Square
Eighteenth & Arch Streets
Philadelphia, PA 19103-2799
Tel: (215) 981-4000

*Attorneys for the National Football
League and NFL Enterprises LLC*

CERTIFICATE OF SERVICE

I, Brad S. Karp, hereby certify that on April 21, 2021, a true and correct copy of the NFL Parties' Motion to Dismiss and the accompanying memorandum of law was filed via CM/ECF, which caused notice to be sent to all counsel of record.

In addition, I caused a true and a correct copy to be served on the following via the United States Postal Service:

Connie Joann Baker
451 Oakford Dr.
Baton Rouge, LA 70815

Connie Joann Baker
P.O. Box 86928
Baton Rouge, LA 70879

Pro Se Plaintiff

Dated: April 21, 2021

By: /s/ Brad S. Karp